



## U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

December 27, 2024

By ECF

The Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Nash v. U.S. Immigration and Customs Enforcement*, No. 21 Civ. 4288 (JPC)  
*Nash v. U.S. Immigration and Customs Enforcement*, No. 23 Civ. 6994 (JPC)

Dear Judge Cronan:

This Office represents U.S. Immigration and Customs Enforcement (“ICE”) in the above-named actions brought by Plaintiff Lindsay Nash under the Freedom of Information Act. We write respectfully on behalf of both parties to provide a status update in accordance with the Court’s Order of October 31, 2024, ECF No. 63.

Plaintiff has made a demand for costs and fees, and ICE is currently undertaking an assessment of that demand and anticipates being in a position to respond within the next 60 days. The parties therefore propose that they submit another status letter on or before March 3, 2025, informing the Court if they anticipate being able to resolve the issue of fees and costs and, if not, proposing next steps.

We thank the Court for its attention to this matter.

Respectfully,

EDWARD Y. KIM  
Acting United States Attorney

By: /s/ Jessica F. Rosenbaum  
 ZACHARY BANNON  
 JESSICA F. ROSENBAUM  
 Assistant United States Attorneys  
 86 Chambers Street, 3rd Floor  
 New York, New York 10007